

I am currently the Operations and Director of Engineering for a group of television stations in South Dakota, Nebraska and Wyoming, we are market size 178. When I read the proposed rule making to require all television stations to make a "off air" recording of ALL our programs I was distressed that something like this would be required when it is not necessary. This would NOT stop people having another Super Bowl Costume Malfunction. To record all programming would be a serious problem for our company not only would it be a financial burden but also to make sure that we were making six separate recording for each of our stations would be a very difficult task. We are on the air 24/7 so that would mean that we would six separate tape machines available to make these recordings. With most VCR tapes you can record 6 hours per tape, we would need four tapes per station per day, or 24 tapes per day. Then we would possibly need to store these tapes for nine months. These would amount to just less than 3,000 tapes, that would need to be dated, cataloged and stored in case they were needed.

This idea is an idea that only could be thought of in the BeltWay were we build buildings by the gross and fill them up with material that has no value.

This proposal is not necessary other than our three half hour newscast daily, we do not have any control on the content of the program. They are either syndicated or network programs, this is typical for most stations in the US, so why would it be necessary to have all of these tapes?

Our estimated costs for us to set up this recording station is in excess of \$50,000. We would need to install a new router bank to make the six separate recording at a cost of \$25,000, plus \$15,000 for the 3,000+ video tapes and \$10,000 for VCR decks and necessary mounting equipment. Plus the labor costs for the intial installation and daily labor costs. Typically VCR decks have a life expectancy of 24-36 months so that you can see the costs would continue. Please do not make the industry shoulder another financial burden on something that is not needed, many of us are still trying to recover from the digital mandate that was so difficult for the small market television station.

Thank you for listening to my comments

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